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BLANK ROME LLP Attorneys for Defendant Jeremy J.O. Harwood (JH 9012) 405 Lexington Avenue The Chrysler Building New York, NY 10174 (212) 885-5000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SAN JUAN NAVIGATION (SINGAPORE) PTE. LTD.,

Plaintiff,

- against -

TRANS POWER CO. LTD.,

Defendant.

Mitron denied without propodice as not in occardence with Controls.	
SO ORDERED:	24 442
Date: 3/19/18	Richard M. Barner
CV 1562 (RMB)	Richard M. Berman, U.S.D.J.

USDC SDNY
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JOSE #:
DATE FILED: 3/19/08

NOTICE OF MOTION UNDER RULE E OF THE RULES FOR SUPPLEMENTAL CERTAIN ADMIRALTY AND MARITIME CLAIMS AND LOCAL ADMIRALTY RULE E.1 FOR VACATUR REDUCTION OF **PLAINTIFF'S MARITIME** ATTACHMENT AND, OR IN THE ALTERNATIVE, FOR COUNTERSECURITY

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, Notice of Foreign Law dated March 17, 2008 and Declaration of Nicholas Woo dated March 17, 2008 Defendant, will move this Court before the Hon. Richard Berman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to Rule E(4)(f) of the

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Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure vacating or reducing the amount of security and/or substitute security that Plaintiff has attached and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York March 17, 2008

Respectfully submitted,

BLANK ROME LLP

By:

Jeremy J.O. Harwood 405 Lexington Avenue New York, New York 10174

(212) 885-5000

Attorneys for Defendant